

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Implementation of the Commercial Spectrum)	)	WT Docket No. 05-211
Enhancement Act and Modernization of the	)	
Commission's Competitive Bidding Rules and	)	
Procedures	)	

**REPLY COMMENTS OF US WIREFREE**

US Wirefree ("USW"), by its attorneys, hereby submits reply comments in the captioned proceeding.

By a margin of three to one, commenters in this proceeding support the Commission's tentative conclusion to bar large incumbent wireless service providers from having a material relationship with designated entity (DEs) that use bidding credits in spectrum auctions. After reviewing the comments, USW has revised its own position and now supports the benchmark of \$1 billion in average gross wireless revenues for the preceding three years suggested by Centennial Communications Corp. for defining which incumbents are subject to the new restrictions. A \$1 billion benchmark would have the effect of preventing the nation's five largest wireless carriers from taking advantage of bidding credits while allowing DEs to partner with smaller regional or rural service providers. USW continues to believe, however, that the new restrictions should apply only to incumbent wireless service providers and not to all other entities with significant interests in communications.

As the Commission has acknowledged, the top-5 wireless carriers control approximately 90 percent of the country's wireless subscribers and these same carriers won more than half of the licenses in Auction 58 by partnering with DEs. Such statistics provide more than enough evidence to support the adoption of rules to prevent the country's largest wireless carriers from taking advantage of bidding credits intended for small businesses. The Commission is to be commended for proceeding to close that loophole in the DE program.

Respectfully submitted,

US WIREFREE

By:                     /s/                      
Richard S. Myers  
Jay N. Lazrus  
Its Attorneys

March 1, 2006

Myers Lazrus  
1220 Nineteenth Street, NW  
Suite 500  
Washington, DC 20036  
(202) 546-8023